

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NORTH CAROLINA  
ASHEVILLE DIVISION  
CASE NUMBER 1:20CV66**

CARYN DEVINS STRICKLAND, )  
                                  )  
Plaintiff,                  )  
                                  )  
v.                             )  
                                  )  
UNITED STATES OF AMERICA, et al., )  
                                  )  
Defendants.                 )

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**DEFENDANTS' MOTION FOR EXTENSION OF TIME TO RESPOND TO  
PLAINTIFF'S REQUESTS FOR PRODUCTION**

On behalf of Defendants, undersigned counsel hereby moves the Court for a thirty-one day<sup>1</sup> extension of time to respond to Plaintiff's August 10, 2022 requests for production, from September 9, 2022 until October 10, 2022.

Good cause supports this motion. Plaintiff served Defendants with 60 individual document requests, many of which require coordination between multiple Defendants and complex electronic searches that take a substantial amount of time to plan and execute. Moreover, both lead counsel for Defendants have been on long-scheduled family vacations during the period since Plaintiff served her requests. Counsel for Defendants is also balancing deadlines in other cases, as well as preparation for the hearing on Plaintiff's motion for preliminary injunction scheduled for September 8, 2022.

For all of these reasons, the undersigned respectfully requests that the Court grant an extension of time to response to Plaintiff's August 10, 2022 requests for production until October 10, 2022.

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<sup>1</sup> Defendants ask for thirty-one days rather than thirty days to avoid setting a deadline for a Sunday.

Pursuant to Local Civil Rule 7.1(b)(2), the undersigned has consulted with Plaintiff's counsel before filing this Motion. Plaintiff's counsel stated that Plaintiff's position is as follows:

"Plaintiff objects, in part, to Defendants' extension request. Specifically, Plaintiff requests that this court order Defendants to disclose the final investigation report and record of disciplinary action (*see, e.g.*, Decl. of Martinez ¶¶ 99, 101) on or before September 9, 2022. These documents are within the scope of Plaintiff's Document Request Numbers 4 and 9, which were served on Defendants on August 10, 2022. Because Defendants have extensively relied on the investigation report and disciplinary action in their filings, *see, e.g.*, ECF Nos. 134, 135, there is neither any basis to withhold these materials nor any basis for delay in disclosing them. Regarding Plaintiff's remaining document requests, she does not object to Defendants' request for a 30-day extension."

Dated: September 2, 2022

Respectfully submitted,

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Principal Deputy Assistant Attorney General

CARLOTTA P. WELLS  
Assistant Branch Director

/s/ Rachael L. Westmoreland  
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